

November 8, 2002

Dear Ms. Schmeltz:

It has been the role of the Consortium for Energy Efficiency (CEE) to provide comments on ENERGY STAR specifications on behalf of CEE members as many of them may elect to promote the final specification. We recognize the value the ENERGY STAR label provides our member programs and support the ENERGY STAR program for vending machines. However, we would like to make the following comments on the proposed specifications to ensure that ENERGY STAR vending machine specification is one that our members are comfortable promoting.

### **Energy Consumption Specification**

As CEE members will be considering promoting the Energy Star vending machines it is important for them to understand the underlying basis for the specification. The energy savings over baseline in the United States, equipment distribution and availability, and incremental costs associated with these savings are all important factors in identifying an appropriate specification for their promotion. CEE respectfully requests EPA to share currently available information in respect to this. In addition, CEE encourages the continued collection of such data to make future refinements as warranted.

### **Low Power Mode**

The low power mode feature may have limited benefit due to its dependency on operating conditions. Given this, CEE members encourage EPA to further investigate the costs and benefits of the low power mode. Our understanding is that this feature is available in most current products. If this is the case, then the ENERGY STAR specification should define "low power mode" in the same technical terms as defined by industry. This will help clarify what is meant by "low power mode."

### **Label Placement**

As a requirement of the specification, CEE members recommend that the ENERGY STAR label must be placed in an easily identifiable location on a permanent component of the machine so that utility programs, purchasers, and end-users can easily recognize compliant models.

We thank you for this opportunity to comment on the proposed ENERGY STAR specification.

Regards,

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Consortium for Energy Efficiency